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**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

AMERICAN CIVIL LIBERTIES
UNION FOUNDATION OF
SOUTHERN CALIFORNIA,
Plaintiff,

v.

UNITED STATES IMMIGRATION
AND CUSTOMS ENFORCEMENT,
et al.,

Defendants.

Case No. 2:22-CV-04760-SHK

**[PROPOSED] ORDER SETTING
BRIEFING SCHEDULE FOR
CROSS-MOTIONS FOR
SUMMARY JUDGMENT AGAINST
DEFENDANT U. S. IMMIGRATION
AND CUSTOMS ENFORCEMENT**

Honorable Shashi H. Kewalramani
United States Magistrate Judge

EUNICE CHO (*pro hac vice*)

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Attorneys for Plaintiff

1 The Court, having considered the Parties' Joint Stipulation to Set Briefing
2 Schedule for Cross-Motions for Summary Judgment as to Claims Against Defendant
3 U.S. Immigration and Customs Enforcement ("ICE"), and good cause shown, hereby
4 ORDERS as follows:

5 For the Parties' briefing on search adequacy:

- 6 • Defendant ICE shall complete its production of documents by January 22,
7 2025;
- 8 • Defendant ICE shall produce a search summary to Plaintiff by February
9 19, 2025. The search summary shall include dates of searches, all search
10 terms used, custodians and file locations searched, and the number of pages
11 produced by ICE;
- 12 • Plaintiff shall file a Motion for Summary Judgment on search adequacy by
13 February 26, 2025;
- 14 • Defendant ICE shall file a Cross-Motion for Summary Judgment and
15 Opposition Brief by March 19, 2025;
- 16 • Plaintiff shall file its Opposition and Reply Briefs by April 9, 2025;
- 17 • Defendant ICE shall file its Reply Brief by April 23, 2025;
- 18 • A hearing on the Cross-Motions regarding search adequacy will be held
19 on May 7, 2025 [or on a day thereafter at the convenience of the Court.]
20

21 For the Parties' briefing on claimed exemptions and withholding of documents:

- 22 • Plaintiff shall provide a list of documents to ICE for inclusion in a *Vaughn*
23 index by January 29, 2025;
- 24 • Defendant ICE shall produce a *Vaughn* Index to Plaintiff by March 19
25 2025;
- 26 • Plaintiff shall file a Motion for Summary Judgment on withholding and
27 improper redactions by April 30, 2025;
28

- Defendant ICE shall file its Cross Motion for Summary Judgment and Opposition Brief by May 21, 2025;
- Plaintiff shall file its Opposition and Reply Briefs by June 11, 2025;
- Defendant ICE shall file its Reply Brief by June 25, 2025;
- A hearing on the Cross-Motions regarding claimed exemptions and withholding of documents will be held on July 9, 2025 [or on a day thereafter at the convenience of the Court.]

IT IS SO ORDERED.

Dated:

Honorable Shashi H. Kewalramani
United States Magistrate Judge